



April 1, 2024

Via ECF

MEMO ENDORSED

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

USDC SDNY
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DATE FILED: 4/2/2024

Re: Longside Ventures LLC, et al. v. Hempacco Co., Inc., et al.
Docket No.: 1:22-cv-08152-ALC

Dear Judge Carter:

This firm represents Plaintiffs in the above captioned matter. This letter is sent with the consent of all parties. The parties respectfully request an extension of the deadline to complete depositions regarding jurisdictional issues and the deadline for Plaintiffs to file an Amended Complaint. The reason for the extension is that jurisdictional document discovery, although completed, took longer than anticipated, and additional time is now needed for depositions. In that regard, the parties propose the following amended schedule:

- Plaintiffs shall be entitled to take the depositions of Defendants Hempacco Co., Inc. and Mexico Franchise Opportunity Fund, LP pursuant to F.R.C.P. 30(b)(6), the scope of which shall be limited to the jurisdictional issues raised in the Court's September 29, 2023 Order. These depositions will not preclude Plaintiffs from taking further depositions of these parties (and others, if necessary) regarding the substance of the claims. These depositions shall be completed by **May 15, 2024**.
- Nothing herein shall preclude Defendants from seeking the depositions of Plaintiffs, limited to the jurisdictional issues raised in the Court's September 29, 2023 Order, subject to good cause shown. Plaintiffs reserve all objections to Defendants seeking such depositions.
- Plaintiffs will file their Amended Complaint on or before **June 14, 2024**.

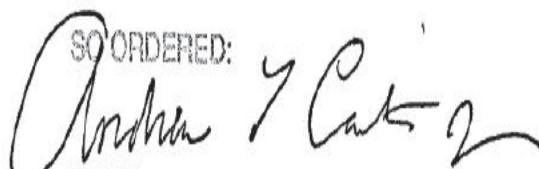
The parties respectfully request that the Court So Order the above amended schedule.

Respectfully submitted,

**CAMPOLO, MIDDLETON
& McCORMICK, LLP**

By: Jeffrey V. Basso, Esq.

cc: *All Parties via ECF*

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: April 2, 2024